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January 8, 2003

Mr. Thomas M. Dorman  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602

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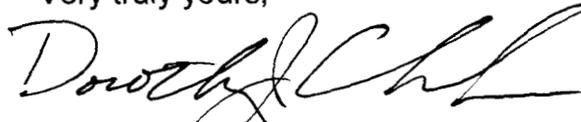
PUBLIC SERVICE  
COMMISSION

Re: Inquiry Into the Use of Contract Service Arrangements by  
Telecommunications Carriers in Kentucky  
PSC 2002-00456

Dear Mr. Dorman:

Enclosed for filing in the above-captioned case are the original and ten (10) copies of BellSouth Telecommunications, Inc.'s Motion for Reconsideration and Motion for Extension of Time.

Very truly yours,



Dorothy J. Chambers

Enclosures

cc: Parties of Record

475489

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INQUIRY INTO THE USE OF CONTRACT SERVICE )	
ARRANGEMENTS BY TELECOMMUNICATIONS )	CASE NO.
CARRIERS IN KENTUCKY )	2002-00456

BELLSOUTH TELECOMMUNICATIONS, INC.'S  
MOTION FOR RECONSIDERATION AND MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc., ("BellSouth"), by counsel, hereby moves for reconsideration of the December 19, 2002, decision of the Public Service Commission (the "Commission"), with regard to certain filing requirements and also for an extension of 45 days, to and including March 24, 2003, to file its responses to the Data Requests in Appendix C to the Commission's December 19, 2002, Order.

As grounds for this motion, BellSouth notes that there are nine data requests which seek a variety of documents, as well as asking detailed policy questions. In order to produce the factual and documentary information requested and also to give due consideration to the important issues the Commission seeks to address in this docket, BellSouth seeks certain modifications in the manner and timing of its response.

BellSouth notes the Commission's order requires the production of very voluminous materials. Specifically, Data Request No. 1 of Appendix C to the December 19, 2002, Order, requires the parties to provide by February 5, 2003, full and complete copies of all contract service arrangements ("CSAs") entered during 2001 and 2002, or, for those CSAs on file with the Commission, a list of those CSAs and their effective

dates. Data Request No. 1 also contains 11 subparts detailing the specifics of the information to be provided. BellSouth advises that its response to this data request, as presently written, will be voluminous and will require the production of approximately 780 contracts as well as detailed analysis of the specifics of those contracts. For that reason, BellSouth seeks the revisions to the requested production, as noted herein.

First, BellSouth seeks permission for any contracts required to be produced to be filed with the Commission on CD-ROM rather than in paper form. Second, BellSouth also requests permission to file a reasonable sample of the contracts rather than all of the contract materials. BellSouth proposes that a reasonable, random sample of approximately 10 percent of the contracts be provided. This represents a significant reduction in volume, while providing the Commission with a representative sample of the contracts. If this proposal is acceptable, BellSouth will be happy to provide, for the Commission's use, a list of the CSAs entered into during the relevant time period from which this sample can be drawn. Finally, BellSouth requests an extension of 45 days, as noted above, to file all responses to the requests in Appendix C.

For the foregoing reasons, BellSouth respectfully requests that its Motion for Reconsideration and Motion for Extension of Time be granted.

Respectfully submitted,



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COUNSEL FOR BELL SOUTH  
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475340

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the individuals on the attached Service List by mailing a copy thereof, this 8th day of January 2003.

  
Dorothy J. Chambers

**SERVICE LIST – PSC 2002-00456**

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